

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH MULL, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

GOTHAM DISTRIBUTING
CORPORATION AND OLD SCHOOL
VENTURES, INC., individually and
collectively d/b/a OLDIES.COM

Defendants.

NO. 2:24-cv-06083-GJP

JUDGE GERALD J. PAPPERT

**RENEWED STIPULATION AND [PROPOSED] ORDER FURTHER
EXTENDING DEFENDANTS' TIME TO RESPOND TO COMPLAINT**

WHEREAS, on November 13, 2024, Plaintiff Joseph Mull (“Plaintiff”) filed his Complaint (Dkt. 1) against Defendants Gotham Distributing Corporation and Old School Ventures, Inc., d/b/a Oldies.com (“Defendants” and, together with Plaintiff, the “Parties”);

WHEREAS, Defendants’ response to the Complaint was due on or before December 27, 2024 (Dkts. 5–6);

WHEREAS, on January 3, 2025, the Parties stipulated and agreed to a 30-day extension of time to respond until January 27, 2025.

WHEREAS, on January 24, 2025, the Parties stipulated and agreed to a 30-day extension of time to respond until February 26, 2025.

WHEREAS, on January 28, 2025, the Court denied the Parties’ stipulation to extend Defendants’ time to respond for failing to provide a reason for the need for an extension.

WHEREAS, on January 30, 2025, the Parties stipulated and agreed to a 30-day extension of time to respond until February 26, 2025 in order to provide Defendants additional time to adequately investigate the allegations in the Complaint, which was delayed in part by limited availability during the holiday season.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, subject to the Court's approval, that:

1. Defendants shall each respond to Plaintiff's Complaint on or before February 26, 2025.

Dated: January 30, 2025

/s/ Noelle B. Torrice

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*Counsel to Defendant Gotham
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SO ORDERED, this _____, day of _____, 2025.

The Honorable Gerald J. Pappert